

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	Juven's Georges,	Chapter 13 NO: 14-10475
	Debtor	
	US Bank N.A., as trustee, on behalf of The holders of JP Morgan Mortgage Acquisition Trust 2006-CH2 Asset Backed Pass-Through Certificates, Series 2006-CH2,	
	Movant	
	Vs.	
	Juven's Georges,	
	Debtor	
	Nancy Georges,	
	Co-Debtor	

**DEBTOR'S, RESPONSE TO US BANK, NA'S MOTION
FOR RELIEF FROM THE AUTOMATIC STAY UNDER SECTION 362 AND THE CO-
DEBTOR STAY UNDER SECTION 1301**

AND NOW comes Debtor, Juven's Georges, by and through his counsel, Charles Laputka, Esq., and files the following Response to Movant's Motion for Relief From the Automatic Stay, and avers as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied. Paragraph 4 of Movant's Motion constitutes a conclusion of law to which no response is required. Strict proof thereof is demanded.
5. Denied. Paragraph 5 of Movant's Motion constitutes a conclusion of law to which no response is required. Strict proof thereof is demanded.

6. Admitted.
7. Admitted.
8. Denied. Debtors have made several payments between the months of July, 2017 through the present. See attached Exhibit A.
9. Denied. Paragraph 9 of Movant's Motion constitutes a conclusion of law to which no response is required. Strict proof thereof is demanded.
10. Denied. Debtors believe the post-petition arrears quoted are substantially inaccurate.
11. Denied. Paragraph 11 of Movant's Motion constitutes a conclusion of law to which no response is required. By way of further answer, Debtor believes his current balance is less than \$247,605.92. Strict proof thereof is demanded.
12. Admitted in part and denied in part. It is admitted that the Debtor is delinquent, however, the amount indicated as being delinquent in paragraph 12 is inaccurate.
13. Denied. Paragraph 13 of Movant's Motion constitutes a conclusion of law to which no response is required. Strict proof thereof is demanded.
14. Denied. Paragraph 14 of Movant's Motion constitutes a conclusion of law to which no response is required. Strict proof thereof is demanded.

WHEREFORE, the Debtor respectfully requests this Honorable Court deny the present Motion for Relief and grant other further relief as deemed just and appropriate.

Date: 3/2/18

By: /s/ Charles Laputka
Charles Laputka, Esquire
Attorney for Debtor
Atty. I.D. No: 091984
1344 W. Hamilton Street
Allentown PA 18102
(610) 477-0155

EXHIBIT “A”



Statement of Account

610.797.7440 | 800.446.5598 | PeopleFirstCU.org

2141 Downyflake Lane Allentown, PA 18103-4774

Account Number XXXXXX688

Statement Period 08/01/2017 - 08/31/2017

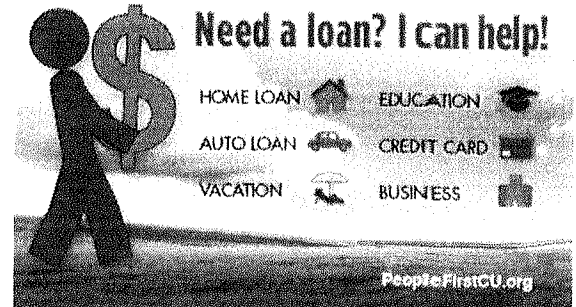
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977020637 1 1/2 UNQ 09-01-17 SD



Juven's Georges
4721 Yorkshire Dr
Macungie PA 18062-8216



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Your Account Balances as of 08/31/17

Primary Share Account 0010	\$5.00
Share Draft Account 0040	391.78-
Account Balance Total	\$386.78-

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PRIMARY SHARE ACCOUNT 0010

Beginning Balance	\$5.00
0 Total Deposits for	0.00
0 Total Withdrawals for	0.00
Ending Balance	\$5.00

SHARE DRAFT ACCOUNT 0040

Beginning Balance	\$28.95
1 Total Deposits for	1,500.00
8 Total Withdrawals for	1,920.73-
Ending Balance	\$391.78-

Date	Transaction Description	Withdrawal	Deposit	Balance
08/01	Card purchase NYU TISCH CAFE Terminal ID: 00009093 NEW YORK NY Ref: 721324091000	\$1.96-		\$26.99
08/01	Card purchase NYU TISCH CAFE Terminal ID: 00009093 NEW YORK NY Ref: 721321091000	3.92-		23.07
08/09	Card purchase COSTCO WHSE #1211 Terminal ID: 99121113 ALLENTOWN PA Ref: 722119597369	1.75-		21.32
08/10	Card purchase NYU TISCH CAFE Terminal ID: 00009093 NEW YORK NY Ref: 722221091000	3.18-		18.14
08/19	Deposit Check		1,500.00	1,518.14
08/19	Card purchase NYU TISCH CAFE Terminal ID: 00009093 NEW YORK NY Ref: 723124091000	1.22-		1,516.92
08/20	Withdrawal ATM PEOPLE FIRST FCU Terminal ID: COPF004 7150 HAMILTON BLVD TREXLETTOWN PA Ref: 000000002125	100.00-		1,416.92
08/22	Withdrawal ACH SELECT PORTFOLIO SPS JUVENS AND NANCY GEOR	1,778.70-		361.78-
08/22	Withdrawal Courtesy Pay Fee	30.00-		391.78-

Fees Paid

Description	Current	YTD	Description	Current	YTD
Acct-0010 Total Return Item Fees	\$0.00	\$0.00	Acct-0010 Total Overdraft Fees	\$0.00	\$0.00
Acct-0040 Total Return Item Fees	\$0.00	\$0.00	Acct-0040 Total Overdraft Fees	\$30.00	\$150.00

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Statement of Account

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2141 Downyflake Lane Allentown, PA 18103-4774

Account Number XXXXXXX688

Statement Period 10/01/2017 - 10/31/2017

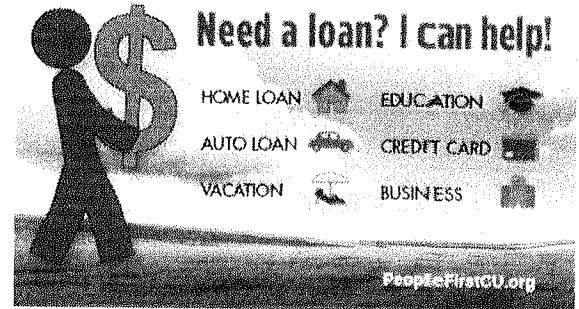
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253021024 1 1/2 UNQ 11-01-17 SD



Juven's Georges
4721 Yorkshire Dr
Macungie PA 18062-8216



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Being a People First member could save you hundreds on Auto and Home Insurance premiums. Get a quote today from either of our two insurance partners. Discounts are available from Travelers Insurance and TruStage Insurance Agency. Visit our website and click the Insurance tab to get started today.

Your Account Balances as of 10/31/17

Primary Share Account 0010	\$5.00
Share Draft Account 0040	435.46-
Account Balance Total	\$430.46-

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PRIMARY SHARE ACCOUNT 0010

Beginning Balance	\$5.00
0 Total Deposits for	0.00
0 Total Withdrawals for	0.00
Ending Balance	\$5.00

SHARE DRAFT ACCOUNT 0040

Beginning Balance	\$1,458.24
1 Total Deposits for	500.00
5 Total Withdrawals for	2,393.70-
Ending Balance	\$435.46-

Date	Transaction Description	Withdrawal	Deposit	Balance
10/11	Withdrawal ATM ACTORS FCU Terminal ID: NY000215 480 3RD AVE NEW YORK NY Ref:728400003382	\$280.00-		\$1,178.24
10/11	Withdrawal ATM ACTORS FCU Terminal ID: NY000215 480 3RD AVE NEW YORK NY Ref:728400003383	200.00-		978.24
10/14	Deposit Check		500.00	1,478.24
10/14	Withdrawal ATM PEOPLE FIRST FCU Terminal ID: COPF006 7150 HAMILTON BLVD TREXLETTOWN PA Ref:000000009723	100.00-		1,378.24
10/23	Withdrawal ACH SELECT PORTFOLIO SPS NANCY & JUVENS GEORGES	1,778.70-		400.46-
10/23	Withdrawal Courtesy Pay Fee	35.00-		435.46-

Fees Paid

Description	Current	YTD	Description	Current	YTD
Acct-0010 Total Return Item Fees	\$0.00	\$0.00	Acct-0010 Total Overdraft Fees	\$0.00	\$0.00
Acct-0040 Total Return Item Fees	\$0.00	\$0.00	Acct-0040 Total Overdraft Fees	\$35.00	\$185.00

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Statement of Account

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2141 Downyflake Lane Allentown, PA 18103-4774

Account Number XXXXXX688

Statement Period 11/01/2017 - 11/30/2017

Page 2 of 3

SHARE DRAFT ACCOUNT 0040

Continued from previous page.

Date	Transaction Description	Withdrawal	Deposit	Balance
11/21	Card purchase NYU TISCH CAFE Terminal ID: 00009093 NEW YORK NY Ref: 732520091000	3.33-		1,283.41
11/21	Comment ATM ATM Inquiry BANK OF AMERICA Terminal ID: INYH4823 *NEW YORK UNIVERSITY - NEW YORK NY Ref: 73255527			1,283.41
11/21	Withdrawal ATM Inquiry Fee BANK OF AMERICA Terminal ID: INYH4823 *NEW YORK UNIVERSITY - NEW YORK NY	0.50-		1,282.91
11/21	Deposit Cash		40.00	1,322.91
11/22	Withdrawal ACH SELECT PORTFOLIO SPS NANCY & JUVENS GEORGES	1,813.74-		490.83-
11/22	Withdrawal Courtesy Pay Fee	35.00-		525.83-

Fees Paid

Description	Current	YTD	Description	Current	YTD
Acct-0010 Total Return Item Fees	\$0.00	\$0.00	Acct-0010 Total Overdraft Fees	\$0.00	\$0.00
Acct-0040 Total Return Item Fees	\$0.00	\$0.00	Acct-0040 Total Overdraft Fees	\$35.00	\$220.00

Mark Your Calendars

- Lobby Day: Friday, December 8, from 3:00 PM- 5:00 PM. People First Business Lending will be at our Trexlertown Office, Better Homes Realty will be at our Nazareth Office and TruStage Insurance will be at our Bethlehem Township Office.
- Santa will be at our Devonshire Office on Saturday, December 9, 2017, from 10:00 AM-1:00 PM. Receive a photo with Santa, a holiday balloon, and candy cane. Don't forget to bring along a non-perishable food item donation for Second Harvest Food Bank.
- Our offices will be closed on Monday, December 25, 2017, in observance of the Christmas holiday and Monday, January 1, 2018, in observance of the New Year's Day Holiday.

Continued on next page.



Statement of Account

610.797.7440 | 800.446.5598 | PeopleFirstCU.org

2141 Downyflake Lane Allentown, PA 18103-4774

Account Number XXXXXXXX688

Statement Period 01/01/2018 - 01/31/2018

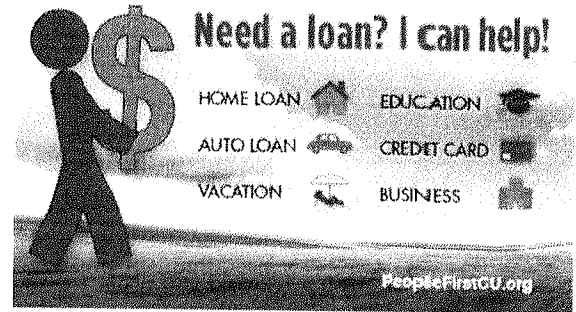
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834021096 1 1/2 UNQ 02-01-18 SD



Juven's Georges
4721 Yorkshire Dr
Macungie PA 18062-8216



FREE member education seminar- Your Credit Score

Join us for our upcoming member education seminar; *Your Credit Score* on Wednesday, February 21, 2018. The session will start at 6:15 PM at our Devonshire Office; 2141 Downyflake Lane, Allentown, Pa 18103. This workshop provides education on the different types of scoring models available, with the focus on FICO score, and what steps can be taken to better your score. RSVP by visiting PeopleFirstCU.org/Education or by calling 610.797.7440 Ext. 768 by February 16, 2018. Space is limited.

Your Account Balances as of 01/31/18

Primary Share Account 0010	\$5.00
Share Draft Account 0040	1,258.97
Account Balance Total	\$1,263.97

Need a Loan?

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PRIMARY SHARE ACCOUNT 0010

Beginning Balance	\$5.00
0 Total Deposits for	0.00
0 Total Withdrawals for	0.00
Ending Balance	\$5.00

SHARE DRAFT ACCOUNT 0040

Beginning Balance	\$1,373.67
1 Total Deposits for	1,700.00
4 Total Withdrawals for	1,814.70-
Ending Balance	\$1,258.97

Date	Transaction Description	Withdrawal	Deposit	Balance
01/05	Withdrawal ACH SELECT PORTFOLIO SPS NANCY & JUVENS GEORGES	\$1,778.70-		\$405.03-
01/05	Withdrawal Courtesy Pay Fee	35.00-		440.03-
01/22	Deposit Check		1,700.00	1,259.97
01/25	Comment ATM ATM Inquiry PNC BANK Terminal ID: PM3721 4900 HAMILTON BLVD WESCOSVILLE PA Ref:802500004928			1,259.97
01/25	Withdrawal ATM Inquiry Fee PNC BANK Terminal ID: PM3721 4900 HAMILTON BLVD WESCOSVILLE PA	0.50-		1,259.47
01/25	Comment ATM ATM Inquiry PNC BANK Terminal ID: PM3721 4900 HAMILTON BLVD WESCOSVILLE PA Ref:802500004929			1,259.47
01/25	Withdrawal ATM Inquiry Fee PNC BANK Terminal ID: PM3721 4900 HAMILTON BLVD WESCOSVILLE PA	0.50-		1,258.97

Fees Paid

Description	Current	YTD	Description	Current	YTD
Acct-0010 Total Return Item Fees	\$0.00	\$0.00	Acct-0010 Total Overdraft Fees	\$0.00	\$0.00
Acct-0040 Total Return Item Fees	\$0.00	\$0.00	Acct-0040 Total Overdraft Fees	\$35.00	\$35.00

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**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	Juven's Georges,	Chapter 13
	Debtor	NO: 14-10475
	US Bank N.A., as trustee, on behalf of The holders of JP Morgan Mortgage Acquisition Trust 2006-CH2 Asset Backed Pass-Through Certificates, Series 2006-CH2,	
	Movant	
	Vs.	
	Juven's Georges,	
	Debtor	
	Nancy Georges,	
	Co-Debtor	

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Response to Motion For Relief from the Automatic Stay was served upon the following individuals via ECF or first-class United States mail, postage prepaid, this 2nd day of March, 2018:

Office of the U.S. Trustee
833 Chestnut Street, Suite 500
Philadelphia, PA 19107

Frederick L. Reigle, Esquire
2901 Saint Lawrence Avenue
Reading, PA 19606

Rebecca Solarz, Esquire
KML Law Group, PC
701 Market Street
Philadelphia, PA 19106

By: /s/ Charles Laputka
Charles Laputka, Esquire
Attorney for Debtor
Atty. I.D. No: 091984
1344 W. Hamilton Street
Allentown PA 18102
(610) 477-0155